

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. 12-CR-30123-GPM
)	
BILL ADRIAN,)	Title 29, United States Code, Section 501(c)
Defendant.)	Title 18, United States Code, Section 664

INFORMATION

THE UNITED STATES ATTORNEYCHARGES:

INTRODUCTION TO THE SCHEME TO DEFRAUD

1. **BILL ADRIAN** was employed from 1998 through the present by the Plumbers Union Local 101, located in Belleville, Illinois, as their Business Manager/Secretary Treasurer. At all times material to this Indictment Plumbers Union Local 101 was a labor organization engaged in an industry affecting commerce and subject to the Labor Management Reporting and Disclosure Act of 1959, 29 U.S.C. § 401, et seq.

2. As the Business Manager/Secretary Treasurer **BILL ADRIAN** was to promote harmonious relations between the employers and the union, work with the other officers in the union for the efficient management of business, and work with the Executive Board to ensure all finances were audited and accounted for. **BILL ADRIAN** was responsible for preparing a financial report to be provided to the Executive Board and to the General Membership at each Union meeting. **BILL ADRIAN**, therefore, had a fiduciary responsibility as an officer of Plumbers Union Local 101, a labor organization. Also, by virtue of his position as Business Manager/Secretary Treasurer, **BILL ADRIAN** was a trustee on the union's employee benefit plans, including the United Association

Local 101 Joint Apprenticeship Training Committee, a fund subject to the provisions of the Employment Retirement Income Security Act (ERISA).

3. **BILL ADRIAN** had a union-issued credit card to pay for Union or Benefit Plan travel-related expenses and all Union or Benefit Plan automobile-related expenses such as gasoline, oil changes and repairs. Personal expenses were not allowed to be charged on the Union or Benefit Plan credit cards.

4. **BILL ADRIAN** did knowingly engage in activity to defraud the Plumbers Union Local 101 with the intent to deceive and cheat the Plumbers Union Local 101 and their Employee Benefit Plans out of a portion of funds that were paid to the Union by members and from other sources. As part of the scheme to defraud, **BILL ADRIAN** did expend Union funds for payment of personal purchases unrelated to the Union or Employee Benefit Plans. To further conceal the embezzlement and the use of union funds for personal purchases, **BILL ADRIAN** submitted false annual financial reports, called LM 2's to the Department of Labor.

COUNT 1

EMBEZZLEMENT AND THEFT FROM A LABOR UNION

1. Paragraphs 1 through 4 are realleged and incorporated herein.
2. From on or about at least January of 2008 and continuing through December of 2011, in St. Clair County, within the Southern District of Illinois,

BILL ADRIAN,

defendant herein, while an officer of Plumbers Union Local 101, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to his own use the money, funds, securities, properties, and other assets of said labor organization.

All in violation of Title 29, United States Code, Section 501(c).

COUNT 2


EMBEZZLEMENT AND THEFT FROM AN EMPLOYEE PENSION OR WELFARE BENEFIT PLAN AND A FUND CONNECTED WITH SUCH PLAN

1. Paragraphs 1 through 4 are realleged and incorporated herein.
2. From on or about at least January of 2008 and continuing through December of 2011, in St. Clair County, within the Southern District of Illinois,


BILL ADRIAN,

defendant herein, while an officer of Plumbers Union Local 101, did embezzle, steal and unlawfully and willfully abstract and convert to his/her own use and the use of another, the moneys and funds of the United Association Local 101 Joint Apprenticeship Training Committee, an employee welfare benefit plan subject to Title I of the Employee Retirement Income Security Act of 1974 and of a fund connected with such plan.

All in violation of Title 18, United States Code, Section 664.



NORMAN R. SMITH
Assistant United States Attorney



STEPHEN R. WIGGINTON
United States Attorney

Recommended Bond: \$10,000 unsecured